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October 5, 2020

**BY ECF**

Honorable John Peter Cronan  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *J.C.-M. v. N.Y.C. Dep't of Educ.*, 20-cv-3953 (JPC)(BCM)

Dear Judge Cronan:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel, and the attorney assigned to represent defendant New York City Department of Education in the above-referenced matter, wherein Plaintiff seeks attorneys' fees, costs, an expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request a 90-day stay of this case. Plaintiff consents to this request. The need for the stay is to provide Plaintiff's attorney, Ms. Irina Roller, with sufficient time to send relevant attorney billing records and for my office to review said records, and work toward settlement. Furthermore, Ms. Roller has agreed to provide all relevant billing records two weeks after the filing of this letter.

Accordingly, Defendant respectfully requests a 90-day stay on this case to January 5, 2021.

Thank you for considering this request.

Respectfully submitted,

/s/ Malini Dhanraj  
Malini Dhanraj  
Assistant Corporation Counsel

cc: All Counsels of Record (ECF) **Defendant's request is GRANTED.**  
**This case is hereby STAYED until**  
**January 5, 2021.**

**SO ORDERED.**

Date: October 13, 2020  
New York, New York

  
JOHN P. CRONAN  
United States District Judge